KEVIN G. HORBATIUK (KGH-4977) MATTHEW P. MAZZOLA (MM-7427) RUSSO, KEANE & TONER, LLP Attorneys for Defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. 26 Broadway - 28th Floor New York, New York 10004 (212) 482-0001

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE COMBINED WORLD TRADE CENTER AND LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

LUZ MANCO,

DOCKET NO: 08 CV 2654

Plaintiff,

-against-

100 CHURCH, LLC, 120 LIBERTY STREET, 2 BROADWAY, LLC, 20 BROAD STREET CO., 90 CHURCH STREET LIMITED PARTNERSHIP, ALAN KASMAN DBA KASCO, AMBIENT GROUP, INC., AMG REALTY PARTNERS, LP., LTD., ANN TAYLOR STORES CORPORATION, BATTERY PARK CITY AUTHORITY, BELFORUSA GROUP, INC., BFP ONE LIBERTY PLAZA CO., LLC., BLACKMON-MOORING STEAMATIC CATASTOPHE, INC., d/b/a BMS CAT, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BOSTON PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, **BROOKFIELD PROPERTIES HOLDING, INC** COLLERS ABR, INC., CUNNINGHAM DUCT CLEANING CO., ENVIROTECH CLEAN AIR, INC., GENERAL RE SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HILLMAN ENVIRONMENTAL GROUP, LLC HUDSON VIEW EAST CONDOMINIUM,

NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT

HUDSON VIEW TOWERS ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., JONES LANG LASALLE AMERICAS, INC., JONES LANG LASALLE SERVICES, INC., KASCO RESTORATION SERVICES CO., LAW ENGINEERING, P.C., MERRILL LYNCH & CO., INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP., NEW YORK CITY INDUSTRIAL DEVELOPMENT, AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, R Y MANAGEMENT CO., INC., ROYAL AND SUNALLIANCE INSURANCE GROUP, RY MANAGEMENT, SABINE ZERARK, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THE BOARD OF MANAGERS OF ONE LIBERTY PLAZA CONDOMINIUM (CONDO # 1178), THE ONE LIBERTY PLAZA CONDOMINIUM (#1178), TOSCORP INC., TRC ENGINEERS, INC., TUCKER ANTHONY, INC. VORNADO OFFICE MANAGEMENT LLC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA CO. GP, CORP., WFP RETAIL A CO., WFP TOWER A CO., G.P. CORP., WFP TOWER A CO., L.P., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., L.P., WFP TOWER B CO., L.P., WORLD FINANCIAL PROPERTIES, L.P., and ZAR REALTY MANAGEMENT CORP., ET AL

Defendants.

PLEASE TAKE NOTICE, that defendant CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC. ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York May 2, 2008

Kevin G. Horbatiuk
Kevin G. Horbatiuk (KGH4977)
Matthew P. Mazzola (MM-7427)
Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO.,
INC.
RUSSO, KEANE & TONER, LLP
26 Broadway, 28th Floor
New York, New York 10004
(212) 482-0001
RKT File No. 824.078

TO: CHRISTOPHER R. LaPOLA, ESQ.,
WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorney for Plaintiff
LUZ MANCO
115 Broadway 12th Floor
New York, New York 10006
(212) 267-3700

CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 2nd day of May, 2008.

CHRISTOPHER R. LaPOLA, ESQ., WORBY GRONER EDELMAN & NAPOLI BERN, LLP Attorney for Plaintiff **LUZ MANCO** 115 Broadway 12th Floor New York, New York 10006

Kevin & Horbattuk